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COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

STATE BOARD OF EDUCATION
PUBLIC SCHOOL SYSTEM
P.O. BOX 501370
SAIPAN, MP 96950



Commissioner of Education
Rita Hocog Inos, Ed.D

COMMENTS WC Docket No. 02-60 Rural Health Care Support Mechanism

The Commonwealth of the Northern Mariana Islands, Public School

System, submits comments in replying to the Rural Health Care Support Mechanism, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking. The comments are made in accordance with the Commission's December 24, 2003 *Public Notice* and are specific to: (a) the definition of "Rural Area," (b) Internet discount levels and (c) possibilities for shared use of RHCD and SLD networks.

Definition of "Rural Area"

FCC seeks comments on whether a new definition of 'rural area' should be adopted. This response is directed toward the recommendation for FCC to "define rural as non-urbanized areas, as specified by the Census Bureau." Using the Census Bureau's formula for rural and urban based on population density will not accurately define the rurality of very small, remote and populated Pacific Islands. The population per square mile in the Commonwealth of the Northern Mariana Islands is 242¹. For most remote insular areas demographically population density is very high but in reality these areas are extremely rural, isolated and far removed from specialty and subspecialty care and health training programs. Any new definition of rural and urban to be adopted by the FCC for the Rural Health Care Program and Schools and Libraries Division must take into

¹ U.S. Census Bureau - <http://www.census.gov/population>

consideration the unique situation of our Pacific jurisdictions that differ greatly in geographical characteristics from states in the continental U.S.

There are problems with the current FCC designation of 'urban areas' in the Pacific Island. Saipan is designated as the urban area for the Commonwealth of the Northern Marianas Islands, however we do not have a population of 50,000 or greater that defines a metropolitan area, meet the population definition of micropolitan areas (a new OMB designation for an area with an urban cluster of 10,000 individuals)². Our jurisdictions are defined as entirely rural by the Universal Service Administrative Company (USAC)³ and the U.S. Department of Health and Human Services⁴.

Discount Level of Internet Service

The FCC provides a 25% discount level for Internet access. We would like to add to our previously submitted comments regarding the need for Quality of Service, need for more robust supporting network infrastructure and high cost for carriers to meet both of these requirements. Taking all of this into consideration, it may be feasible for rural health care providers to benefit from an Internet service discount of 75% or more in the Pacific insular areas. This would enable the development of infrastructure and supporting QOS services by the carrier at an affordable cost to the HCP.

² U.S. Census Bureau – About Metropolitan and Micropolitan Statistical Areas, <http://www.census.gov/population/www/estimates/aboutmetro.html>

³ <http://www.rhc.universalservice.org/eligibility/rurallist.asp>

⁴ <http://www.whitehouse.gov/omb/inforeg/msa99.pdf>


Partnerships between RHCD and SLD benefactors.

In our island community we as the Department of Education work closely with our health care providers (HCPs). Adding to comments previous submitted by PEACESAT we strongly support the FCC's encouragement of partnerships between RHCD and SLD benefactors. We strongly support consideration of the FCC in permitting HCPs in sharing network resources with schools and libraries as consortium members with shared cost or however best determined by the FCC.

We appreciate the opportunity to register our comments regarding the unique situation of the rural and remote insular of our islands and are confident that the Commission will continue to work towards finding a way forward regarding the issues surrounding and preventing the Pacific Island jurisdictions from participating and benefiting from the RHCD program.

Respectfully submitted,

Commonwealth of the Northern Mariana
Islands
Public School System

By:  /s/ Rita Hocog Inos, Ed.D
Commissioner of Education
P.O. Box 501370
Saipan, MP 96950
inosr@pss.cnmi.mp

cc: James Hofschneider
Secretary
Department of Public Health
Commonwealth Health Center